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7 Attorney for Defendant  
8 CARLOS IVAN VARGAS, SR.

9  
10 UNITED STATES DISTRICT COURT  
11  
12 NORTHERN DISTRICT OF CALIFORNIA  
13  
14 SAN JOSE DIVISION

15 UNITED STATES OF AMERICA, ) No. CR-09-00888 JF  
16 Plaintiff, ) STIPULATION AND [PROPOSED] ORDER  
vs. ) CONTINUING STATUS CONFERENCE  
17 CARLOS IVAN VARGAS, SR., et al., )  
18 Defendants. )  
19  
20 \_\_\_\_\_)

21 Plaintiff UNITED STATES OF AMERICA, through its counsel of record, Assistant  
22 United States Attorney ("AUSA") Jeffrey B. Schenk, and defendants CARLOS IVAN  
23 VARGAS, SR., JOHN MASAKAZU TASHIRO and DANIEL JOSE DOMINGUEZ,  
24 through their respective counsel of record, Peter Goodman, Assistant Federal Defender  
25 ("AFD") Varell Fuller and John J. Jordan, hereby stipulate and agree as follows:

26 1. A Status Conference in this matter is presently scheduled for Thursday,  
27 April 8, 2010, at 9:00 a.m.

28 2. A forensic accounting expert is assisting counsel for defendant VARGAS  
in reviewing the voluminous business records provided in discovery that the government  
alleges detail the mail and wire fraud conspiracies charged against the defendants in the  
indictment. The expert is also employed as a staff accountant by a private accounting  
firm that is preparing tax returns for its clients which are due April 15, 2010. Counsel for



1 SO STIPULATED

2 DATED: April 5, 2010

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4 /s/

5 JOHN J. JORDAN  
6 Attorney for Defendant  
7 DANIEL JOSE DOMINGUEZ

8 GOOD CAUSE APPEARING from the parties' Stipulation Continuing Status  
9 Conference, IT IS HEREBY ORDERED that the Status Conference in this matter, which  
10 is scheduled for April 8, 2010, at 9:00 a.m., be continued to May 6, 2010, at 9:00  
11 a.m.

12 DATED: 4/5/10

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14 JEREMY D. FOGEL  
15 United States District Court Judge

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